

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

|                             |   |                     |
|-----------------------------|---|---------------------|
| In re:                      | : |                     |
| Boneta L. Borrero           | : | Case No.15-10555TPA |
|                             | : | Chapter 13          |
| Debtor(s)                   | : |                     |
| Carl Borrero                | : |                     |
|                             | : | Re Doc.149          |
| Movant(s)                   | : |                     |
|                             | : |                     |
| vs.                         | : |                     |
| Boneta L. Borrero, and      | : |                     |
| Ronda J. Winnecour, Trustee | : | Hearing Date 2/7/17 |
| Respondent(s)               | : |                     |

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

Ronda J. Winnecour, Chapter 13 Trustee, respectfully represents the following:

1. Carl Borrero requests relief from stay of the divorce action so that the parties may try the divorce proceeding to conclusion in the Court of Common Pleas of Erie County.
2. The Trustee has no objection to relief from stay to permit the parties to enforce the divorce decree; however, the Bankruptcy Court should retain its jurisdiction over the estate assets, and no equitable distribution should be made final without the approval of the Bankruptcy Court.

WHEREFORE, the Trustee respectfully requests that the Court retain jurisdiction over the estate assets.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: 01/08/18

by     /s/ Jana S. Pail      
Jana S. Pail - PA I.D. #88910  
Attorney for Trustee  
US Steel Tower – Suite 3250  
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CERTIFICATE OF SERVICE

I hereby certify that on the 08<sup>th</sup> of January 2018, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
Suite 970, Liberty Center  
1001 Liberty Avenue  
Pittsburgh PA. 15222

Michael Graml, Esquire  
714 Sassafras Street  
Erie PA 16501

Boneta Borrero  
PO Box 334  
North East PA 16428

Daniel Foster, Esquire  
PO Box 966  
Meadville PA 16335

/s/Dianne DeFoor  
Office of Chapter 13 Trustee  
US Steel Tower – Suite 3250  
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